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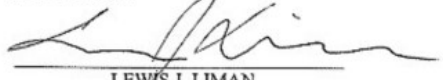
August 8, 2024

Dated: August 15, 2024
SO ORDERED.

VIA ECF

The Honorable Lewis J. Liman
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1620
New York, NY 10007

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

Re: Great American Ins. Co. v. Gemstone Property Mgmt. LLC, et al.
Docket No.: 23-CV-09100 (LJL) (GS)

Dear Judge Liman,

I am currently an associate at Subin Associates, LLP, and we represent Defendants/Third-Party Plaintiffs Gemstone Property Mgmt. LLC, DHNY Apt IV LLC, and Luis Garcia Salcedo (hereinafter collectively referred to as “Defendants”). I write to request a stay of further proceedings in this matter until new counsel is assigned to represent my clients.

As previously indicated (see, Docket No. 95), today is my last day as an associate of Subin Associates, LLP, and I have acted as the primary and sole attorney handling this file for the firm. It has been determined that I will not continue as the handling attorney for this file after I leave the firm and begin my new associate position at another firm. Accordingly, to protect my clients’ interests, I respectfully request that all deadlines and proceedings in this matter be stayed pending the assignment or retention of new counsel.

I did not anticipate the need to request a full stay of proceedings and, given the urgency of the application prompted by my imminent departure from the firm, I have not been able to consult with the attorneys for all parties concerning their position on a stay. I note, however, that all discovery deadlines were stayed on consent of all parties, including those yet to join the action. I further note that there are no other pending deadlines affecting my clients as the counterclaims filed by Third-Party Defendant Aspen Specialty Insurance Company were answered.

I apologize for this inconvenience, and I thank you for your consideration and attention in this matter. Should the Court require anything further, I am available until August 9, 2024, at the Court’s convenience to discuss any issues and can be reached at (347) 341-7368 or csoverow@subinlaw.com. I will also call chambers shortly to provide my private contact information off the record.

Respectfully submitted,

SUBIN ASSOCIATES, LLP



By: _____

August 8, 2024

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